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Attorney for Movant,
GEMB LENDING INC.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:)	CASE NO.: 09-23551-A-13
)	Chapter 13
RONALD M. MICHAELSEN, II aka)	D.C. No.: JAH-001
RONALD MARTIN MICHAELSEN, II;)	
LAURIE INEZ MICHAELSEN,)	DATE: June 15, 2009
)	TIME: 9:00 a.m.
)	PLACE: CTRM 28, 7 th Floor
)	501 I Street
Debtors.)	Sacramento, CA
_____)	

MOTION OF GEMB LENDING, INC. FOR RELIEF
FROM THE AUTOMATIC STAY AND FOR LEAVE TO REPOSSESS AND SELL
PERSONAL PROPERTY

Movant, GEMB Lending Inc. (herein GEMB) hereby moves the
above-entitled court for an Order relieving it from the Automatic
Stay and allowing it to repossess and sell, in accordance with
applicable non-bankruptcy law, its personal property security
which is a 2008 Gulf Stream G-Force 280 motor coach bearing VIN #
1NL1GTN2081029753 (herein Collateral).

This Motion is made on the grounds that cause for Relief
from Stay exists because Debtors have no equity in the subject
property and because cause exists for relief from stay because

1 Debtors have defaulted in making payments and no equity cushion
2 protects the interest of Morequity. Additionally, the subject
3 property is not necessary to an effective reorganization and
4 Debtors' proposed Plan proposes to surrender said collateral to
5 GEMB.

6 This Motion is based upon the Notice of Hearing which is
7 being served and filed concurrently herewith and upon the
8 Declaration of Barry Wright and Memorandum of Points and
9 Authorities which are attached hereto and upon all of the papers
10 and records on file herein.

11 WHEREFORE, Movant respectfully prays that this Court:

12 1. Vacate the automatic stay of 11 U.S.C. section 362,
13 along with any and all other stays which might be in effect, so
14 as to allow Movant to repossess and sell its collateral in
15 accordance with applicable non-bankruptcy law;

16 2. Terminate all automatic stay provisions to allow Movant
17 and its agents to serve any and all parties protected by the stay
18 with any and all notices that may be required by applicable law
19 or regulation;

20 3. Waive the provisions of Federal Rules of Bankruptcy
21 Procedure 4001(a)(3); and,

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1 4. For such other and further relief as the Court may deem
2 proper.

3 DATED: May 11, 2009

4 LAW OFFICES OF JOHN A. HENDRY

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6 /S/ John A. Hendry
7 JOHN A. HENDRY, Attorney for
8 Movant, MOREQUITY, INC.
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